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14 [Names and addresses of other parties and their  
15 counsel appear at end]

16 UNITED STATES DISTRICT COURT

17 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18  
19 In re DYNAMIC RANDOM ACCESS  
MEMORY (DRAM) ANTITRUST  
20 LITIGATION

21 This Document Relates To:

22 ALL INDIRECT PURCHASER ACTIONS

23  
24 No. M-02-1486-PJH

25 MDL No. 1486

26  
27  
28 STIPULATION AND [PROPOSED]  
ORDER MODIFYING NOVEMBER 3,  
2005 AND MAY 15, 2006 SCHEDULING  
ORDERS FOR ALL UNSTAYED  
INDIRECT PURCHASER ACTIONS

Date: None

Time: N/A

Judge: The Hon. Phyllis J. Hamilton

**STIPULATION**

Indirect Purchaser Plaintiffs and Defendants (collectively, the “parties”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, the parties have been negotiating extensions to Defendants' responses to outstanding discovery and the parties' deadlines for class certification briefing;

WHEREAS, on May 5, 2006, the parties submitted a Stipulation and Proposed Order to the Court;

WHEREAS, in that Stipulation, Plaintiffs agreed to Defendants' request that they be given an additional thirty (30) days to respond to the Indirect Purchaser Plaintiffs' First Set of Interrogatories to All Defendants and First Set of Requests for Production of Documents to All Defendants, such that the responses would be due on May 31, 2006;

WHEREAS, in that Stipulation, the parties described a request by the Indirect Purchaser Plaintiffs that the schedule for filing and briefing their class certification motion, as set forth in the Indirect Purchaser Pretrial Scheduling Order (entered on November 3, 2005), be extended for 90 days;

WHEREAS, in that Stipulation, the Defendants agreed to a 30-day extension of that schedule as it pertains to the class certification motion so that the parties can attempt to negotiate a complete pretrial schedule (including rescheduling the class motion deadlines), without prejudice to the Indirect Purchaser Plaintiffs' ability to seek further modification of the Pretrial Scheduling Order;

WHEREAS, that Stipulation and Proposed Order was accepted and signed by the Court on May 16, 2006;

WHEREAS, the Defendants requested that they be given an additional nine (9) days to respond to the Indirect Purchaser Plaintiffs' First Set of Interrogatories to All Defendants and First Set of Requests for Production of Documents to All Defendants, such that the responses would be due on June 9, 2006; and

WHEREAS, the parties engaged in good faith negotiations to resolve all outstanding scheduling issues and have resolved scheduling issues related to discovery and class certification;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

2 (i) Defendants' responses to the Indirect Purchaser Plaintiffs' First Set of Interrogatories  
3 to All Defendants and the First Set of Requests for Production of Documents to All Defendants are  
4 due on June 9, 2006.

5 (ii) The PROPOSED NEW SCHEDULE FOR INDIRECT PURCHASER CASES, as set  
6 forth in the Indirect Purchaser Pretrial Scheduling Orders, shall be revised as follows:

7 **August 14, 2006** Last day for indirect purchaser plaintiffs to file (a) class  
8 certification expert reports; and (b) motion for class  
9 certification.

10 **September 25, 2006** Last day for defendants to file (a) class certification expert  
11 reports; and (b) opposition to indirect purchasers' class  
12 certification motion.

13 **October 18, 2006** Last day for indirect purchaser plaintiffs to file (a) class  
14 certification reply expert reports and (b) class certification  
15 reply brief.

16 **November 1, 2006** Class certification argument (subject to Court's calendar).

17  
18 DATE: June 12, 2006

19 INDIRECT PURCHASER PLAINTIFFS:

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11  
12 SO ORDERED.  
13

14  
15 DATED: 8/4/06  
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**CERTIFICATE OF SERVICE**

**IN RE DYNAMIC RANDOM ACCESS MEMORY (DRAM)  
ANTITRUST LITIGATION SERVICE LIST**  
**Case No. M-02-1486 PJH**  
**MDL No. 1486**

I, Monica J. Steele, certify and declare under penalty of perjury that I: am a citizen of the United States; am over the age of 18 years; am employed by Zelle, Hofmann, Voelbel, Mason & Gette LLP, 44 Montgomery Street, Suite 3400, San Francisco, CA 94104, whose members are members of the State Bar of California and at least one of whose members is a member of the Bar of each Federal District Court within California; am not a party to or interested in the cause entitled upon the document to which this Certificate of Service accompanies; and that on June 12, 2006, I served a true and correct copy of the following document(s) in the manner indicated below:

**1. STIPULATION AND [PROPOSED] ORDER MODIFYING NOVEMBER 3, 2005 AND MAY 15, 2006 SCHEDULING ORDERS FOR ALL UNSTAYED INDIRECT PURCHASER ACTIONS**

**By USDC Live System-Document Filing System:** on all interested parties registered for e-filing.

Dated: June 12, 2006

Signed /s/ Monica J. Steele  
Monica J. Steele  
Secretary

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